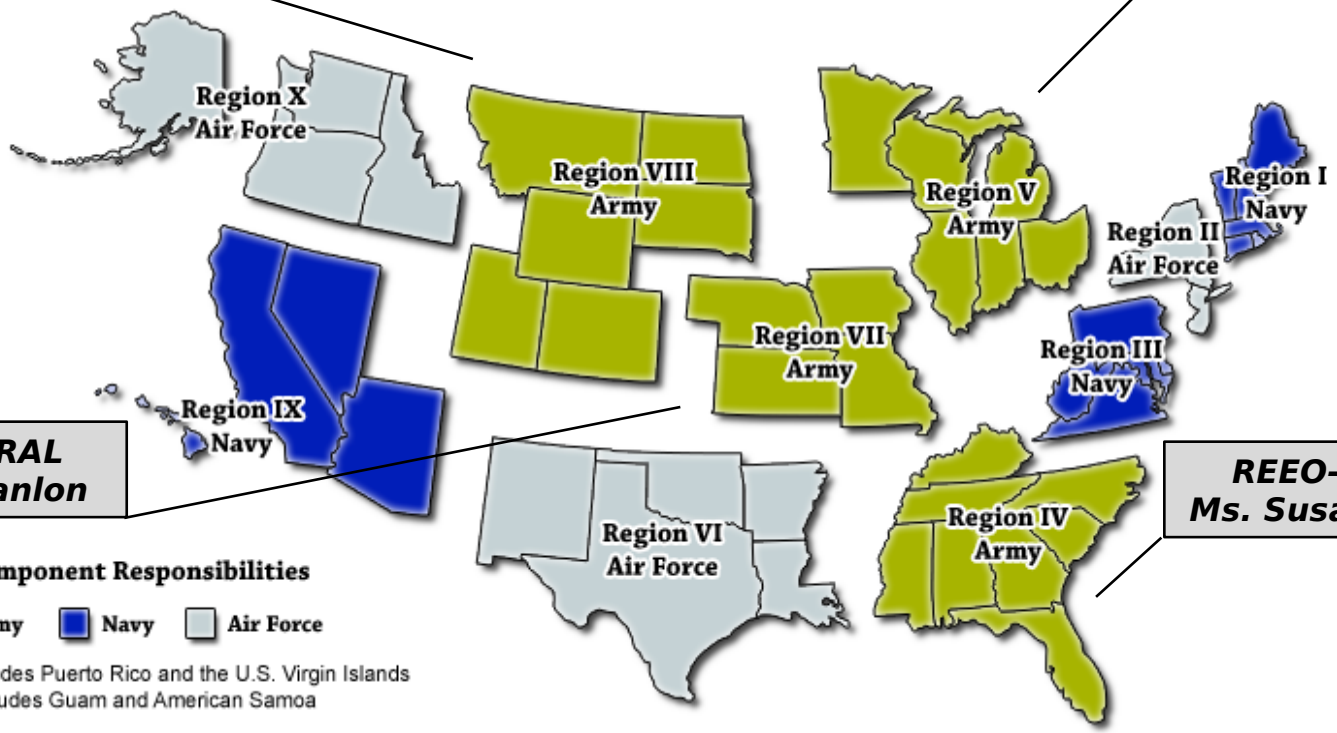
Army Regional Environmental and Energy Office
Triannual Review
29 August 2012

REEO-WEST
Mr. Mark Mahoney

REEO-NORTH
Dr. Jim Hartman

REEO-CENTRAL
Mr. Steve Scanlon

REEO-SOUTH
Ms. Susan Gibson



Purpose

Create a forum (using both presentation and dialogue) to enable DASAs and stakeholders to better understand and guide the work of the REEOs, while ensuring the accomplishment of all aspects of the Defense Regional Environmental Coordination mission, assigned to the Army by the Department of Defense (DoDI 4715.02)

Desired Outcomes

- Enhance teamwork and promote integration of the REEOs into the work of ASA(IE&E), ACSIM, and the broader Installation Management Community
- Promote greater understanding of role, functions, and contributions of the REEOs
- Provide each REEO Director the opportunity to lead a discussion and improve understanding of a specific topic of their choosing
- Identify opportunities for REEOs to enhance collaboration for environmental, energy, and other areas
- Conduct internal working session focused on “financials,” contracted services, and other areas

Context

- REEOs are a DoD directed, state and regional legislative and regulatory interface (by DoDI 4715.02)
  - Army is directed to serve as DoD Regional Environmental Coordinator (REC) in four regions (4,5,7, and 8)
  - Army is directed to serve as Service Component in all ten Regions
- In 2007, the REEOs were transferred to OASA(IE&E) from the Army Environmental Command, a Direct Reporting Unit to ACSIM, in recognition of their potential to support policy development
- In 2010, they were renamed Regional Environmental and Energy Offices (REEOs) by ASA(IE&E), to embrace the increasingly important energy role
- The REEOs are performing a vital mission … during a period in which legislative and regulatory involvement is increasing … and the availability of resources are decreasing

Mission and Core Functions

Mission Statement: To fulfill responsibilities as DoD RECs, engage with state legislators, Federal and state regulators, and nongovernmental organizations, on behalf of DoD and Army to enable the conduct of activities on our installations required to build readiness to execute the Army's global mission. Conduct strategic communications for the purpose of promoting greater understanding of the Army's commitment to sustainable practices and energy security.

Core Functions:

- Execute DoD Regional Environmental Coordination
- Impact Favorably on Legislative Context
- Impact Favorably on Regulatory Context
- Advance DoD and Army Interests and Objectives
- Provide Information and Expertise to Assist Policy Development
- Support Mission of Army Installations and Facilities

“REEOs in Action”

Impact Favorably on Legislative Context

2011 State Legislative Successes. REEO-C worked with other stakeholders and the Missouri legislature to prepare and deliver written testimony on several bills that were ultimately consolidated into a single piece of legislation, House Bill (HB) 1251, that was enacted by the Governor. HB 1251 has two key effects, which will be favorable to the accomplish-ment of the military mission:

(1) It creates a "No Stricter / No Sooner" provision for state solid and hazardous waste laws – the result will be that the standard for enforcement within Missouri can be "no stricter" than the Federal standard established in the Resource Conservation and Recovery Act (RCRA), and that reporting requirements can be demanded "no sooner" than what is established by Federal law.

(2) The cost for DoD entities to comply will be less than originally expected. Affected activities in Missouri include: Fort Leonard Wood, Lake City Army Ammunition Plant, Whiteman Air Force Base, and numerous National Guard and Reserve facilities. This progress builds upon similar work performed by REEO-C and others, which resulted in Missouri enacting similar " No Stricter / No Sooner" laws for implementing the Federal Clean Air Act.

This work reflects the REEOs' ability to identify and respond to opportunities to influence laws or regulations, while formative. The establishment and communication of priorities – for desired outcomes and focus areas – will help the REEOs to make greater contributions (in a proactive vice reactive mode). (ACP 2-1, 2-2, and 2-4) **(REEO-C)**

- **Recommendation**. That OASA(IE&E), integrating the input and requests for action from the DASAs, ACSIM, and other stakeholders, improve the guidance issued to the REEOs – with a view to improving their ability to plan and focus resources to better achieve Department of the Army priorities (while fulfilling the requirements of DoDI 4715.02).

Impact Favorably on Legislative Context. *Track state legislative and rule making activities which could impact on installations' ability to perform their missions. Engage states to anticipate, understand, and manage potentially adverse impacts on installation activities.*

Impact Favorably on Legislative Context

Wilderness Legislation Impacts on Army Flight Operations in Colorado. The designation of Federal lands as Wilderness, or Wilderness Study Areas, would present a significant threat to longstanding military operations in and above Federal lands. REEO-W has worked with a number of legislators and Wilderness advocates for nearly 10 years on these issues.

The most current threat to Army operations is posed by the combined effect of three different Wilderness proposals that would affect military operations in Colorado. These proposals would have two pronounced effects on Army flight operations:

(1) At greatest risk, are the operations that rely on access to the High Altitude Aviation Training Site (HAATS), located southeast of Eagle, Colorado. HAATS is the only training site in DoD that provides this irreplaceable training environment. Wilderness designation of certain areas would prevent high altitude touch-and-go training.

(2) Future operations associated with Fort Carson's new Combat Aviation Brigade (CAB) could be impacted. The CAB at Fort Carson will need to fly easily into and out of the installation's military airspace and readily access low-level flight environments and landing zones. (ACP 2-1 and 2-3) **(REEO-W)**

- **Recommendation**. That REEO-W continue to work with the Federal legislators proposing these bills, the Wilderness Coalitions advocating designation of specific wilderness areas, and the affected installations and facilities, to prevent the imposition of undue constraints on flight operations. Keep Office of Congressional Legislative Liaison (OCLL) aware of interactions with Colorado's Federal legislators.

Impact Favorably on Legislative Context. *Track state legislative and rule making activities which could impact on installations' ability to perform their missions. Engage states to anticipate, understand, and manage potentially adverse impacts on installation activities.*

Impact Favorably on Regulatory Context

California Greenhouse Gas (CA GHG) Cap and Trade Rule. The CA Air Resource Board recently put into effect its Cap and Trade rule. This rule will initially impact only facilities which emit more than 25,000 tons of CO^2 equivalents during a calendar year.

During extensive discussions led by DoD REC 9, in which REEO-W participated as the Army Component, the Board was told of the potential impact to military operations that would result from the immediate implementation (and enforcement) of this rule. The final rule provides for a two-year DoD exemption from Cap and Trade rules (until 31 December 2013).

The RECs continue to communicate the position that the CA GHG cap and trade rule should not apply to the military because of the Federal Government's sovereign immunity exemption, as recognized in the Clean Air Act.

This potentially precedent-setting position could have national implications, affecting other states in which military installations and facilities are located, as similar state GHG cap and trade programs are considered. (ACP 2-1 and 2-3) **(REEO-W)**

- **Recommendation**. That REEO-W continue to track CA GHG efforts in an effort to minimize potential impacts to military training – and seek the support of ASA(IE&E) and DUSD(I&E) as required – in light of the precedent that might be established as other states explore their own GHG legislation.

Impact Favorably on Regulatory Context. *Track state legislative and rule making activities which could impact on installations' ability to perform their missions. Engage states to anticipate, understand, and manage potentially adverse impacts on installation activities.*

Impact Favorably on Regulatory Context

<u>Participation in Georgia Public Service Commission (PSC) Meeting</u>. REEO-S met with the Georgia Public Service Commission (PSC) on 12 July to provide a briefing on pertinent EITF efforts. PSC has exclusive power to regulate utility rates for service provided under its jurisdiction. PSC is interested in conducting further discussions with the Army focused on maximizing Power Purchase Agreements (PPAs) in Georgia. Additionally, PSC is looking for additional solar opportunities.

A future meeting with PSC is being organized with EITF to expand renewable energy opportunities in Georgia. PSC is looking for input regarding its rules – with a view to creating a climate more favorable to the development and employment of renewable energy. (ACP 8-1 and 8-2) **(REEO-S)**

- **Recommendation.** That REEO-S and EITF continue to work with the PSC to develop new regulatory language.

<u>Resolution of Gopher Tortoise (GT) Permitting with Florida Regulators</u>. During negotiations with the Florida Fish and Wildlife Conservation Commission (FWCC), REEO-S clarified DoD's legal position regarding species management on active installations. REEO-S actively negotiated for revisions to be incorporated into the draft FWCC GT management guidelines. Originally, the draft guidelines sought to extend permitting authority over active installations, while also purporting to exempt some mission critical activities.

Region 4 counsel worked with Florida counsel to resolve any misperception regarding the state's legal authority to require permits for any DoD species management activities – and to ensure that appropriate military-specific provisions were included into the final permitting guidelines. The significant concerns raised by the National Guard were consolidated into the guidance. The FWCC guidelines were closely coordinated with the USFWS and are now viewed as a "template" for future management plans in other states. (ACP 2-1, 2-3, 2-4, 2-6) **(REEO-S)**

- ***Impact Favorably on Regulatory Context.*** *Track state legislative and rule making activities which could impact on installations' ability to perform their missions. Engage states to anticipate, understand, and manage potentially adverse impacts on installation activities.*

Impact Favorably on Regulatory Context

Partnering Meetings with State Regulatory Agencies in Region 5. In 2010, REEO-N, acting in its capacity as DoD REC for Region 5, developed a concept and initiated a program of meetings between DoD Active, Reserve, and National Guard organizations and state environmental regulatory agencies.

Military attendees at these meetings include: installation environmental and facility managers, installation leadership, State National Guard leadership, U.S. Army Corps of Engineers, Air Force and Navy Regional Environmental Coordinators, and other DoD organizations. Regulatory agency attendees routinely include: agency directors or commissioners and members of their senior staffs.

These meetings have been very successful in five areas:

(1) strengthening relationships and communications;
(2) identifying and resolving environmental and regulatory issues;
(3) obtaining information on regulatory agency compliance priorities;
(4) reviewing proposed state regulatory or legislative changes potentially impacting the military; and,
(5) sharing sustainability and energy security initiatives and lessons learned.

Some key outcomes from past meetings include: developing options for installations and facilities to meet new state requirements for underground storage tank training and certification, and obtaining commitments for compliance assistance from regulatory agencies. Strong support for these meetings continues, as evidenced by the high level of participation and interest on the part of regulatory agency and senior military leadership of the States. (ACP 2-1, 2-3, 2-4, 2-6, 3-0, and 4-0) **(REEO-N)**

- **Recommendation.** That REEOs continue with state partnership meetings and look for opportunities to engage Army and DoD subject matter experts as necessary.

Impact Favorably on Regulatory Context. *Track state legislative and rule making activities which could impact on installations' ability to perform their missions. Engage states to anticipate, understand, and manage potentially adverse impacts on installation activities.*

Impact Favorably on Regulatory Context

REEO-S [Region 4 Director (Army)] Army REEO-S Negotiates Anniston Permit Concessions with Alabama Regulators. REEO-S recently organized a meeting with the Director of the Alabama Department of Environmental Management (ADEM) to discuss modifications to an environmental permit at Anniston Army Ammunition Depot (ANAD). Both Army and EPA have expressed significant concerns with the modifications that ADEM staff proposed.

The concerns compelled the EPA Region 4 Regional Administrator to call Ms. Hammack on multiple occasions to lend Army its support, should the Army resist the proposed modifications.

In an effort to avoid protracted dispute and preserve existing relationships with ADEM, REEO-S requested a meeting with the ADEM Director. The ADEM Director held a meeting with the Army on 20 August 2012.

During the meeting, REEO-S, personnel from the Army Environmental Command (AEC), and ANAD staff provided the Army perspective to the ADEM Director and his staff. The ADEM Director agreed to delay the permit modifications from going into effect. He also agreed to assemble a team from ADEM and the Army to develop agreeable permit language.

These results will lead to a better permitting approach at ANAD – potentially saving significant resources that would otherwise need to be committed to comply with the current proposed permit. (ACP 2-1, 2-3, 2-4, and 2-6) **(REEO-S)**

- **Recommendation.** That REEOs remain responsive to, and supportive of, DASA(ESOH), AEC, the garrisons, and leaders from the Installation Management Community to safeguard Army interests.

Impact Favorably on Regulatory Context. *Track state legislative and rule making activities which could impact on installations' ability to perform their missions. Engage states to anticipate, understand, and manage potentially adverse impacts on installation activities.*

Advance DoD and Army Interests and Objectives

Support to Army's Energy Initiatives Task Force (EITF). REEO-N, like all other REEOs, has progressively increased their support for the mission of the EITF.

In late June 2012, REEO-N developed its inaugural report which described the climate for advancing renewable energy in Maryland and New York (as well as each state's vision and goals). The report describes relevant energy legislation and regulation in each state. REEO-N's focus on these two states was based on the current focus of EITF projects.

The REEO-N report will be updated quarterly, or as significant changes occur in legislation and regulations.

In May 2012, REEO-N briefed Governor's energy advisors in Washington, DC. The briefing focused on the Army's EITF program. Participants showed considerable interest in this program. States were encouraged to look at the incentives they might be able to offer to support an EITF project.

As a result of this briefing, the Maryland Energy Administration (MEA) met in late June 2012 with representatives of the U.S. Army Garrison Fort Detrick, the EITF, and REEO-N. This meeting was conducted to discuss renewable research and projects underway, and under consideration, at Fort Detrick. (ACP 2-1, 2-3, 2-4, 2-6, 3-0, and 4-0) **(REEO-N)**

- **Recommendation.** That REEOs continue to identify opportunities to advocate to promote EITF goals and specific projects, including presentations describing the Army's energy security and Net Zero programs at major venues.

Advance DoD Army Interests and Objectives. *Educate, inform, and promote greater understanding of DoD's and the Army's mission and associated requirements and activities in the areas of infrastructure, installation services, energy, environmental stewardship, and its enduring commitment to implementing sustainable practices.*

Advance DoD and Army Interests and Objectives

<u>Army Expedites DoD Notification of Endangered Species Act (ESA) Actions</u>. REEO-S worked with the U.S. Fish and Wildlife Service (USFWS) Regional office to develop a "real-time" – web based – means to expedite notification of DoD and other interested parties of new ESA actions.

Until this addition to the existing USFWS web site, there was no consolidated location for DoD and the public to monitor ESA petitions, intents to sue, 90-day findings, and 12-month findings.

This new section of the web site enables the earliest possible notification of these actions to a large audience, with a minimum effort by USFWS staff. Use of this site, will allow DoD to receive more immediate notification of ESA actions, evaluate DoD implications, and provide early responses when warranted. (ACP 2-1, 2-4, 2-6, 5-6, 6-1, 9-3, 9-5) **(REEO-S)**

- **Recommendation**. That REEO-S and ACSIM educate installations in the Southeast about use of the website to monitor ESA actions. REEO-S will also advocate that similar initiatives be undertaken by USFWS in other regions.

Advance DoD Army Interests and Objectives. *Educate, inform, and promote greater understanding of DoD's and the Army's mission and associated requirements and activities in the areas of infrastructure, installation services, energy, environmental stewardship, and its enduring commitment to implementing sustainable practices.*

Provide Information and Expertise to Assist Policy Development

Protecting Army Interests at White Sands Missile Range (WSMR) and Fort Bliss during SunZia Transmission Line Environmental Impact Statement (EIS) Process. Army installations in New Mexico consulted REEO-C because SunZia (a developer of energy transmission lines) was meeting separately with them and the affected USAF installations in NM. Sun Zia was working to "play one against the other." REEO-C and the AF Regional Environmental Office (REO) set up several joint meetings with affected installations and parties. (These parties include: Fort Bliss, WSMR and Holloman, Kirtland, and Cannon Air Force Bases (AFBs)), SunZia, Bureau of Land Management (BLM) and NM legislative representatives).

The Army REEO and Air Force REOs worked out a process for consolidating and de-conflicting all installations' comments on NEPA documents, as well as advising service Headquarters of developments. Army and AF RECs encouraged and assisted installations to become Cooperating Agencies in the SunZia EIS process. REEO-C supported WSMR when the OSD Clearinghouse wanted to downplay their concerns with the preferred route for the transmission line as proposed in the draft EIS.

REEO-C insisted that the installations have a right to comment as Cooperating Agencies on the EIS. Action by the REEO significantly altered the process and likely the route of the SunZia transmission line project. If left to SunZia, BLM and the political process, the outcome would likely have impacted operations at WSMR, Fort Bliss, and Holloman AFB.

REEOs must remain vigilant of major activities in their AORs and be ready to coordinate communications among installations, Army Commands, HQDA, and DoD entities to protect Army training and testing missions while allowing for continued energy development. (ACP 3-3, 4-3, 5-5, 5-6, and 6-6) **(REEO-C)**

- **Recommendation**. That ASA(IE&E), DASA(ESOH), DASA(E&S), Army G-3/5/7, and ACSIM act to ensure that installations retain the authority to participate as NEPA Cooperating Agencies in future energy

Provide Information and Expertise to Assist Policy Development. *Identify and report significant initiatives, trends, emerging issues, and lessons learned with the view to enhancing the role of DoD and Army leadership in policy making and strategy development processes.*

Provide Information and Expertise to Assist Policy Development

Water Issues in the REEO-N Area of Responsibility (AOR). Water scarcity – resulting principally from increasingly frequent drought conditions and increased demand due to population growth over the past several years –
has led many Eastern states to superimpose regulatory schemes on traditional riparian systems.

29 states, which have historically adhered to riparian doctrine, now adhere to some form of "regulated riparianism." *(NOTE: The traditional riparian right to use water is derived from ownership of land, and grants the landowner unlimited use of water on, under, or adjacent to his or her land.)*

In states with regulated riparian systems in the REEO-N AOR, many DoD installations hold one or more water withdrawal permits – despite the fact that Congress has not agreed to subject Federal agencies to state regulation in this area through a waiver of sovereign immunity.

REEO-N has worked with the other Services and the states, in which permitting of withdrawals has become an issue, to reach mutually agreeable resolutions that do not:

(1) require the military to pay permit fees, or
(2) limit the amount of water in the permit in the case of national emergency.

- **Recommendation.** That REEOs continue to work with states and regions on water management while supporting current Army water rights policy – and new Army Campaign Plan goals and Foundational Concepts with respect to water security and sustainability. (ACP 2.0, 3.0, 4.0, 8.0, and 8.3) **(REEO-N)**

Provide Information and Expertise to Assist Policy Development. *Identify and report significant initiatives, trends, emerging issues, and lessons learned with the view to enhancing the role of DoD and Army leadership in policy making and strategy development processes.*

Support Mission of Army Installations and Facilities

Above Ground Storage Tank (AST) and Underground Storage Tanks (UST) Rules. States have begun to implement a variety of new rules related to these two types of fuel storage tanks. These rules have the potential to increase compliance costs, prevent fuel delivery to tanks which are in compliance, or drive up costs for compliance without any corresponding environmental benefit.

Proposed amendments to California Assembly Bill 1566 would place a number of DoD vaulted tanks in a noncompliant status, that could require their premature removal at a significant cost to the military (without a corresponding benefit to the environment).

At the request of the DoD REC 9 team, California's Environmental Protection Agency has formed a Working Group to craft an administrative solution to address vaulted tanks.

In Wyoming, the Army proposed changes to the state's inspection rules for USTs (which required inspections on remote USTs on a monthly basis).

In Washington and Montana, REEO-W is working to assess and address their proposed UST rules – which contemplate excessive penalties on noncompliant tanks – which could result in interruption of fuel delivery to tanks which present no environmental hazards. (ACP 2-5 and 8-0) **(REEO-W)**

- **Recommendation**. That REEO-W continue to work with the Western states to avoid the poorly considered implementation of regulations governing the storage of fuel and other liquid products – and seek the assistance of DASA (ESOH) and ASA(IE&E), as required.

Support Mission of Army Installations and Facilities. *Provide assistance to Army activities, in a properly coordinated fashion, to set the conditions for mission accomplishment.*

Support Mission of Army Installations and Facilities

REEO-S Assistance to the Office of General Council (OGC) and EITF. REEO-S counsel, in support of OGC, participated in a site visit of Redstone Arsenal, Huntsville, AL, 9-10 August. Accompanied by EITF staff members, the purpose of this site visit was to initiate and explore the potential retrofit and expansion of the City of Huntsville, AL's Solid Waste Disposal Authority (SWDA) owned waste-to-energy (WtE) steam plant.

The project envisions the potential cogeneration of steam and electricity to meet the EITF's goals of enabling the Army to achieve 25 percent renewable energy production by 2025.

EITF, with the assistance of REEO-S counsel, Redstone DPW and Energy Program stakeholders, and external analytic support, will determine potential project obstacles and challenges related to the WtE plant expansion and electric generation. (ACP 2-1, 2-3, 8-1, 8-2, 8-3) **(REEO-S)**

- **Recommendation.** That REEO-S continue to support these efforts.

Support Mission of Army Installations and Facilities. *Provide assistance to Army activities, in a properly coordinated fashion, to set the conditions for mission accomplishment.*

Support Mission of Army Installations and Facilities

Army Facilitates BRAC Cleanup at Fort McPherson and Fort Gillem. REEO-S worked with the Georgia Environmental Protection Division (GAEPD) and the Fort Gillem/Fort McPherson BRAC teams to improve the BRAC Clean-up project implementation. REEO-S's efforts enhanced project communication, coordination, and execution, which enabled administrative project reviews to be processed more efficiently and field actions to be implemented more quickly.

This work will improve the success of future Local Redevelopment Authority (LRA) efforts and will reduce overall site funding requirements now and in the future. (ACP 2-3, 2-4, 6-1, 7-2, 9-4) **(REEO-S)**

- Recommendation: That BRAC clean-up projects follow the same structure and guidelines as other clean-up actions.

REEO-C Facilitates Site Closure Efforts at WSMR. WSMR Environmental Attorney contacted REEO-C to enlist support for an upcoming meeting with the New Mexico Environmental Division (NMED). WSMR has not closed a single clean-up site over the last 10 years, despite spending over $10 million dollars in their efforts. NMED, which has managed the clean-up sites, has continually refused to close the sites. NMED has also frequently changed site managers as sites were due to close. The new site managers never accepted documented progress and routinely required new rounds of study and sampling. NMED withdrew from the NM partnering meetings six years ago, which further limited progress.

Last year, the newly appointed Secretary of NMED accepted REEO-C's invitation to rejoin the partnership. Since then, the relationship with the military has dramatically improved. During the April partnering meeting, WSMR and the Army Environmental Command (AEC) outlined their unsuccessful 10-year effort to close sites. In response, the NMED Secretary, David Martin, said he would send a team down to look into the matter. This meeting was scheduled for 22 August. REEO-C has also scheduled a follow-up meeting on 11 September, in Santa Fe, with Secretary Martin at WSMR's request. The support is unprogrammed, but will be beneficial to mission accomplishment. (ACP 2-0, 4-0, 5-0, and 8-0) **(REEO-C)**

- Recommendation: That OASA(IE&E) develop an effective means to address short-fuse contingency travel requirements, which does not require the cancellation of other approved travel requirements.

Support Mission of Army Installations and Facilities. *Provide assistance to Army activities, in a properly coordinated fashion, to get the conditions for mission accomplishment.*

Support Mission of Army Installations and Facilities

Distribution

REEO-N	815
REEO-S	965
REEO-C	233
REEO-W	874

Each Office Also Preparing a Tailored Review of Emerging Energy Goals (of States), Laws, and Rules to Assist the EITF and Others

Support Mission of Army Installations and Facilities. *Provide assistance to Army activities, in a properly coordinated fashion, to set the conditions for mission accomplishment.*

Promote Stewardship and Accountability

- Reduction in leased costs for office space
- Reduction in costs for contracted services
- Clarification and standardization of organizational functions
- Reduction in layer of management
- Improvement in alignment, assessment, and appraisal of performance
- Improvement in alignment of organizational and individual objectives; improvement in linkage to Army Campaign Plan
- Focused effort to leverage REEOs' expertise and longstanding relationships to assist in growing energy mission and the accomplishment of a multitude of ETIF initiatives

Promote Stewardship and Accountability: *Serve as exemplary stewards of human, financial, and material resources, seek opportunities for continuous process improvement to enhance both effectiveness and efficiency.*

REEO Key Strengths and Capabilities

- **Ability to Influence Activities in States ("Where the Action is"):**
  - The vast majority of environmental regulation and enforcement has been delegated to EPA regions and the states.
  - Energy siting and the regulation of energy markets are overwhelmingly state and local issues.
- **Enabler of DoD and Army Mission**. REEOs provide forward deployed offices with an established base of experience – and a network – which enable them to anticipate and demonstrate flexibility and initiatives in responding to challenges and delivering rapid, coordinated responses.
- **Builder of Relationships … Before they're Needed.** In performing their governmental affairs roles, REEOs provide accessibility to senior Federal regional and state leaders which enables them to support environmental stewardship, sustainability, natural resource conservation and other Departmental objectives. Their accessibility for energy security is increasing.
- ***Bottom-Line.*** *REEOs Serve as an Enabler to Military Training, Testing, and Reducing Army Operational Costs.*

Way Ahead

- **Protect and Advance DoD and Army Mission in upcoming State Legislative Sessions.** Continue core functions of reviewing, analyzing, and commenting on proposed and existing state legislation and regulations to protect military training, testing, operations, budgets, and installation activities.
- **Promote DoD and Army Interests (Communication).** Educate and inform stakeholders about Army operational requirements and programs – and the potential impacts from state and federal legislation and regulation on those operations
- **Promote Understanding (Communication).** Engage State officials and other stakeholders to educate and encourage consultation on military related issues/questions.
- **Assist Policy Development.** Keep leadership at OSD, HQDA, IMCOM, and with the other Services, abreast of emerging issues and trends related to energy policy, climate change initiatives, land use regulations, cleanup standards, and other areas.

Way Ahead

- **Support DoD and Army Mission.** Assist ASA(IE&E) and DASA(E&S) with Energy Initiatives Task Force (EITF) implementation and in monitoring and commenting on energy project proposals with potential to impact DoD activities.
  - Conduct outreach at the direction of, and in support of, the EITF.
  - Continue review of proposed Wind Energy Projects in support of OSD Energy Siting Clearinghouse, consistent with evolving HQDA and OSD policy (as enumerated in the current Bureau of Land Management-Department of Defense Memorandum of Understanding).
  - Review and suggest legislative language to allow third party development of renewable energy projects on Army installations and lands.
  - Assess true cost of additional requirements associated with Air Emission Credit Trading.

Issues

- **Improving Communication.**
  - Although improving, the majority of information concerning HQDA policy and communications priorities is “pulled” by the REEOs.
  - Need to “push” more information to facilitate better planning on the part of the REEOs and work to make best use of “know how” and relationships generated from within region.
  - Need to enhance the ability to analyze and act on Trip Reports and other forms of “intelligence.”

- **Accommodating Changing Workload**. Workload is increasing due to additional missions associated with:
  - Support to the EITF,
  - Growing involvement in water supply issues,
  - The OSD directive to play a greater role in “brokering” Air Emission Credits (AERs) among installations of each of the services and other Federal Agencies within a given air basins, and,
  - Other duties.

Backup

Support Mission of Army Installations and Facilities

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- **Recommendation**. That REEO-W continue to work with the Western states to avoid the poorly considered implementation of regulations governing the storage of fuel and other liquid products – and seek the assistance of DASA (ESOH) and ASA(IE&E), as required.

Support Mission of Army Installations and Facilities. *Provide assistance to Army activities, in a properly coordinated fashion, to set the conditions for mission accomplishment.*